

March 13, 2020

Via CM/ECF

The Honorable Katherine Polk Failla
United States District Court
Southern District Of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *Cara Nasisi et al. v. Comprehensive Health Management, Inc.*
Case No. 1:19-cv-4132-KPF
Joint Request for Extension of Time

Dear Judge Failla:

On November 18, 2019, the Court issued an Order on the parties' Agreed Motion to Conditionally Certify a Narrowed Class and Approve Notice to Potential Plaintiffs in the Collective. *See* Dkt. No. 73. In that Order, the Court ordered that the parties file a Supplemental Proposed Civil Case Management Plan and Scheduling Order within 120 days of entry of the order, i.e., by Monday, March 16th. The parties have been discussing a potential mediation of this matter that would preclude the need for further discovery. Consequently, the parties respectfully request that their deadline to submit a Supplemental Proposed Civil Case Management Plan and Scheduling Order be extended by fourteen (14) days, through Monday, March 30th so that the parties can further discuss mediation and determine whether a discovery schedule is needed at this time.

This is the first request for an extension of this deadline. No other scheduled dates will be impacted by the requested extension of time. The parties appreciate the Court's consideration of this request.

Jointly and respectfully submitted,

/s/ Philip A. Goldstein
Philip A. Goldstein
Counsel for Defendant

/s/ Maureen A. Salas
Maureen A. Salas
Counsel for Plaintiffs

Hon. Katherine Polk Failla

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cc: All Counsel of Record via CM/ECF

SO ORDERED:

Date: March 13, 2020
New York, New York



Hon. Katherine Polk Failla